

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 9

STEIN, INC.,)	CASE NOS.
)	09-CA-214633
Respondent,)	09-CA-215131
)	09-CA-219834
and)	
)	CASE NOS.
INTERNATIONAL UNION OF OPERATING)	09-CB-214595
ENGINEERS (IUOE) LOCAL 18,)	09-CB-215147
)	
Respondent,)	CHIEF ADMINISTRATIVE LAW JUDGE
)	ROBERT A. GIANNASI
and)	
)	
TRUCK DRIVERS, CHAUFFEURS AND HELPERS)	
LOCAL UNION NO. 100, AFFILIATED WITH THE)	
INTERNATIONAL BROTHERHOOD OF)	
TEAMSTERS,)	
)	
Charging Party,)	
)	
and)	
)	
LABORERS' INTERNATIONAL UNION OF NORTH)	
AMERICA (LIUNA) LOCAL 534,)	
)	
Charging Party.)	
)	

**RESPONDENT STEIN, INC.'S MOTION FOR 21 DAY EXTENSION OF
TIME TO FILE POST-HEARING BRIEFS**

Respondent, **STEIN, INC.**, respectfully requests a twenty-one (21) day extension of time to prepare and file the post-hearing briefs in this matter. In support of, and as grounds for its motion, Respondent Stein, Inc. states:

1. The administrative hearing in this dispute spanned across five (5) calendar days, September 13-14, 2018; September 17, 2018; and October 22-23, 2018. The transcript of the hearing testimony comprises some 1,345 pages.

2. There are five parties involved in this unfair labor practice dispute: Stein, Inc.; International Union of Operating Engineers, Local No. 18; Truck Drivers, Chauffeurs, and Helpers Local Union No. 100 a/w The International Brotherhood of Teamsters; Laborers' International Union of North America, Local No. 534, and Region 9 of the National Labor Relations Board. The dispute implicates five separate unfair labor practice charges.

3. IOUE Local 18 and Teamsters Local No. 100 have no opposition to this requested twenty-one (21) day extension of time to file post-hearing briefs for all parties. Counsel for Region 9 of the National Labor Relations Board, and counsel for Laborers International Union of North America, Local No. 534 accede to an extension of time for post-briefing only as to fourteen (14) calendar days after the presently scheduled brief due date.

4. Owing to the extensiveness of the accumulated record, and the number of charges (i.e. number of issues that need to be briefed), counsel for Stein, Inc. respectfully requests a twenty-one (21) day extension of time to file post-hearing briefs by all parties in this dispute. The current briefing schedule has post-hearing briefs docketed to be due on November 27, 2018. A twenty-one (21) day extension would place the briefs due to be filed on December 18, 2018.

5. This motion for extension of the briefing schedule is also requested, and justified, by the press of other legal matters confronting counsel for Stein, Inc., including the following: a labor arbitration involving a discharge case in FMCS Case No. 180905-08096 (Electrolux Home Products and International Association of Machinists, Local 623); federal court mediation and summary judgment briefing in Christopher Wickline v. Hendrickson USA, LLC, Case No. 2:18-CV-00112-MHW-EPD (S.D. Ohio, 2018); discovery completion in Occupational Safety & Health Review Commission matter, New River Electrical Corporation, OSHRC Docket No. 18-0523; jurisdictional

briefing in response to a motion to dismiss in Piatt v. Lowe's Home Centers, LLC, Case No. 18-CV-00373 (Miami Cty., 2018); the preparation and submission of a discrimination charge position statement in Ohio Civil Rights Commission Charge No. AKRA3(39770)09042018; 22A-2018-03499C; and the preparation and submission of a discrimination charge position statement in the Ohio Civil Rights Commission Charge No. AKRB3(39836)10032018.

6. This request for a short extension of the current briefing schedule is also predicated upon the intervening holidays of the Thanksgiving week, November 22-23, 2018.

7. No party would be prejudiced by the granting of this requested extension of time, which Respondent Stein, Inc. respectfully requests would apply to all party briefing, and such is necessary for a just, proper, and equitably resolution of this matter and dispute.

WHEREFORE, Stein, Inc. respectfully requests a twenty-one (21) day extension of time to the current post-hearing briefing schedule that would move the due-date briefing from November 27, 2018 to December 18, 2018.

Respectfully submitted,

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Attorney for Respondent,
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CERTIFICATE OF SERVICE

This is to certify that the foregoing Stein, Inc.'s Motion for 21-Day Extension of Time to File Post-Hearing Briefs has been served, via electronic mail, this 14th day of November, 2018, upon the following:

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